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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

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Emergency Petition of Bell Atlantic Corp.)

NSD-L-98-99

For Emergency Authorization to)

End West Virginia's Bandwidth Crisis)

CC Docket 98-11

**REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF
DEVELOPMENT ORGANIZATIONS (NADO)**

National Association of Development Organizations
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August 21, 1998

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I. INTRODUCTION

The National Association of Development Organizations (NADO) respectfully submits a reply to comments filed by other commenters regarding the petition of Bell Atlantic for emergency relief under Section 706 so it can provide the Internet backbone in the state of West Virginia.

The National Association of Development Organizations is a public interest group founded in 1967 to promote community and economic development in America's small metropolitan and rural areas. NADO is a leading advocate for a regional approach to community and economic development. The association's primary goal is to assure all rural citizens have employment opportunities, public services, and a quality of life comparable to other Americans.

NADO and the NADO Research Foundation are committed to assuring that rural America is afforded equal opportunities to create jobs and improve the quality of life through the use of information technologies. We continue to be in full support of Bell Atlantic's emergency petition to provide West Virginia interLATA high-speed bandwidth and agree with Bell Atlantic that there continues to be a lack of a high-speed Internet backbone serving all of West Virginia.

II. THE CRITICAL NEED FOR A COMPREHENSIVE STATEWIDE HIGH-SPEED INTERNET BACKBONE

NADO must reiterate its priority is to ensure that rural consumers have access to advanced telecommunication services, at affordable rates, comparable to those available

in urban areas. Each state has its own unique history, population patterns, culture, economic performance, and social challenges. These unique interests have led states to adopt different telecommunication infrastructures. Each state is presented with a unique set of challenges for attaining the infrastructure it needs to develop and maintain a viable and competitive communications marketplace. The failure to obtain the vitally necessary bandwidth backbone can challenge many states or localities in their efforts to level the playing field with states or localities that have more advanced telecommunications infrastructures.

West Virginia is a rural state with small metropolitan areas. Nevertheless, the state has initiated numerous innovative programs to ensure that its citizens will have access to an advanced statewide communications infrastructure. West Virginia is endeavoring to ensure that its public services, i.e., schools and libraries, and its economic development initiatives have the necessary Internet and high-speed connections to allow for the continued development and use of these necessary data communications systems. However, the significant initiatives and accomplishments of West Virginia to keep pace with the challenges of providing a workable communications infrastructure will be destined to failure unless an interLATA high-speed bandwidth is made available.

In the comments made by AT&T, MCI, Sprint and other service providers in West Virginia, they have stated that there are a variety of high-speed connections in place (cable television fiber optic lines, other fiber links between some of the cities in the state and the installation of an insufficient number of SONET rings and T-3s). However, MCI in its comments to the Commission, stated "MCI is cognizant of the growing demand for Internet access and services. The demand for such services has grown at unprecedented

and exponential rates, resulting in a temporary exhaustion of Internet capacity in West Virginia.”¹ Sprint admitted, “it has capacity constraints of its own in northern West Virginia at the present time.”² The admissions of MCI and Sprint readily confirm the existence of a bandwidth crisis in West Virginia.

The approaches of the commenters to develop an Internet backbone in West Virginia are piecemeal, at best, and do not adequately address the needs of the state in the development of an advanced statewide communications network. Such a network is necessary to ensure that state government agencies, schools, libraries, health care providers, and commercial activities and development will be able to meet the challenges of explosive growth in the areas of data transmission and other high-speed communications. The investments made in West Virginia by the other bandwidth service providers have demonstrated a lack of commitment to the citizens of this state, to the state’s detriment.

Bell Atlantic wants to insure that West Virginia will have the necessary and vital communications services to provide for the educational opportunities, health care needs, social services, and commercial development West Virginia must have to compete with other advanced localities. Bell Atlantic is poised to provide a statewide high-speed communications system, which will meet the current and future needs of all of the users in the state. Of particular importance to NADO is that Bell Atlantic’s infrastructure will serve all of the citizens of the state (both in urban and rural areas), whereas the

¹ Comments of MCI Telecommunications Corporation in Petition of Bell Atlantic – West Virginia for Authorization to End West Virginia’s Bandwidth Crisis, CC Docket No. 98-11, filed August 10, 1998, P.2.

² Comments of Sprint Corporation in Petition of Bell Atlantic – West Virginia for Authorization to End West Virginia’s Bandwidth Crisis, CC Docket No. 98-11, filed August 12, 1998, p.3.

piecemeal approach of the other bandwidth service providers is aimed at some of the urban areas of the state.

This matter has serious implications not only in West Virginia but other similarly affected localities. As demonstrated in West Virginia, the failure of other bandwidth providers to make significant investments in the state to build a comprehensive statewide high-speed communications system deprives educational institutions, health care providers, other public services, and commercial activities of the ability to maintain and enhance their data communication systems. The resultant loss in these services will retard the ability of the state to effectively respond to the needs of its citizens. The failure to place a comprehensive statewide advanced communications infrastructure in West Virginia will severely limit the opportunities the state can make available in the education of its children, hamper its ability to keep pace with the technologies found in larger urban areas in other states, and profoundly affect its goal of bringing more businesses and commercial development to the state. The failure to provide the necessary bandwidth will relegate West Virginia to a second class status among neighboring states to their social, educational, and economic detriment.

III. CONCLUSION

As more and more critical information is being provided through the Internet and advanced data communications systems, rural Americans must be provided the same opportunities to access and communicate such information as is found in urban areas. With the FCC's approval, Bell Atlantic can provide the necessary Internet backbone now, through the use of a comprehensive statewide advanced communications system. Bell

Atlantic has demonstrated its willingness to invest heavily in the future of the citizens of West Virginia. The other bandwidth providers have not demonstrated the same level of commitment.

NADO believes that state and local governments, educational institutions, businesses, and citizens must all work together to ensure the social, educational, and economic health of rural regions. The FCC's policies should allow such rural regions, including West Virginia, to have equal access to the communications technologies currently available. NADO continues to support Bell Atlantic's Emergency Petition to provide the necessary bandwidth backbone to the state of West Virginia.

Respectfully submitted,

A handwritten signature in cursive script, reading "Aliceann Wohlbruck".

Aliceann Wohlbruck
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